

October 7, 2013

Keith Wallace
California Department of Water Resources
Division of Integrated Regional Water Management
Financial Assistance Branch
Post Office Box 942836
Sacramento, CA 94236

Re: San Diego Coastkeeper Response to DWR's Proposition 84-Round 2 Implementation Grant Funding Recommendations and Proposal Evaluation

Dear Mr. Wallace:

This letter provides comments on the San Diego IRWM Implementation Grant Proposal-Round 2 application on behalf of San Diego Coastkeeper ("Coastkeeper") and is in response to the Department of Water Resource's (DWR) evaluation of that proposal.

San Diego's Proposition 84-Round 2 Grant Proposal merits a higher score than that assigned in DWR's evaluation and should receive 100% funding.

Coastkeeper strongly disagrees with the low score given to San Diego's Proposition 84-Round 2 Grant Proposal. The grant proposal includes detailed and thoughtful analysis of the benefits our Region and the State would see and merits 100% funding to achieve that benefit. The San Diego IRWM Region has prepared a formal response to DWR's Proposal Evaluation. Please refer to this document for a point-by-point analysis of each of DWR's statements.

Two program preferences in the IRWM are to "effectively integrate water management programs and projects within a hydrologic region" and to "effectively resolve significant water-related conflicts within or between regions." Considering the extraordinary collaboration among Regions and integration of local efforts to create this proposal, DWR's scoring undermines its stated program preferences and our efforts to accomplish these goals.

San Diego's project selection process is rigorous and competitive in identifying the region's high priority projects and the maximum allocations should be granted.

Extensive outreach, workshops and trainings were conducted to facilitate project integration and to create projects that meet the needs of the region in a cooperative process. A total of 36 projects were submitted and considered for the Region's grant proposal. The projects were evaluated by a Regional Advisory Committee-nominated Project Selection Workgroup comprising municipal agencies, water agencies, NGOs, and DAC groups. The Project Selection Workgroup met 5 times and spent over 24 hours reviewing the details of each project and

identifying a package of projects to be submitted. The grant proposal was unanimously supported by San Diego's 34-member Regional Advisory Committee.

In order to keep our project below the maximum funding allocation stated in DWR's Proposal Solicitation Package (PSP) all 7 of the selected projects were asked to reduce their funding request to the minimum level necessary to successfully execute the project. Grant funding in any amount below that request will result in the elimination of one or more viable, high-priority projects in our region. This is especially troubling considering that DWR provided maximum funding allocations to all Regions, but recommended that some Regions' proposals receive up to 200% their maximum funding allocation--to the clear detriment of San Diego.

DWR's administration of the IRWM Grant Program is in need of significant reform to assure the long-term feasibility of integrated water management.

Coastkeeper has participated in the IRWM program as a member of multiple committees and as a local project sponsor for several years. Our funded project has been highly successful, allowing us to contribute to IRWM goals, collect meaningful data about our region's watersheds and train over 600 community members on issues of water quality, water pollution, water regulation, and water protection. This program has been a springboard from which community members have launched new careers or educational paths dedicated to protecting our region's water.

This success was achieved despite significant bureaucratic barriers to participation. As a small nonprofit organization with minimal administrative support and a reliance on community volunteers, we run exceptionally efficient programs with direct ties to the community. At the same time, the onerous project review, contract execution, reporting and invoicing process and DWR's delay in reimbursing invoiced expenses and processing contractual amendments place an untenable strain on our organization. Altogether, these inefficiencies lead San Diego Coastkeeper to question the feasibility of our continued participation in the IRWM program. DWR's flawed proposal evaluation further illustrates our growing dissatisfaction with the process.

Sincerely,

A handwritten signature in black ink, appearing to read "Travis Pritchard", with a long horizontal line extending to the right.

Travis Pritchard

Water Quality Lab Manager
San Diego Coastkeeper

Member, Regional Advisory Committee, IRWM San Diego
Chair, Project Selection Workgroup, Proposition 84-Round 2 Implementation Grant